

DFG Comment Table, Revised Phase II Report

Comment Number	Chapter/ Sub - Chapter	Page Number	Paragraph, Figure, or Table No.	Commentor/ Agency	Comment	
1	Chapter 1	2	paragraph at top of page	DFG	delete the following words so that it reads as follows: “...throughout California, the introduction of exotic species, water pollution...”	
2	Chapter 1	7	2nd para under Phase II section	DFG	reword the last sentence as follows: “...will be available from CALFED and at major libraries throughout the State.”	
3	Chapter 2	11	First bullet; Fisheries and Water Diversions	DFG	modify last sentence as follows: “The need to protect listed fish species of concern has prompted restrictions ...”	
4	Chapter 2	13	Second Paragraph	DFG	wording is redundant in last two lines with fifth and sixth lines; modify as follows: “.... beneficial uses, improve access to water supplies, and decrease system vulnerability.”	

5	Chapter 2	25	Third bullet at top of page	DFG	wording is redundant to second bullet and several errors exist in wording; modify as follows: “.... managing water supply and environment demand in order to additional reduce conflicts between beneficial uses, improve access to water supplies , and place decrease system vulnerability.”	
6	Chapter 2	28	CALFED's Water Management Strategy	DFG	This section needs to be updated to conform more closely to the strategy described in Chapter 4 and the Stage 1 actions listed for the Water Management Strategy	
7	Chapter 3; section 3.3 Diversion effects on fisheries	37	2nd bullet under first st paragraph	DFG	reword so that it reads as follows: “...away from the screens influence of the export facilities”	

8	Chapter 3	41	Second paragraph under Response to New Facility Issues	DFG	<p>We recommend modifying the language as follows to clarify how storage contributes to an effective EWA:</p> <p>“Storage that is dedicated to the environment is an essential element of an for a successful operation of the Environmental Water Account. While the account will initially access existing storage to store its water assets on a temporary basis, where possible to move water in time for later use to the benefit of the ecosystem, new storage, a portion of which is dedicated to the environment, would significantly improve effectiveness of the account. New storage would provide an assurance for continued successful operation of the account that temporary rights to existing storage would not.”</p>	P
9	Chapter 4; Water Quality section	46	1st para; fifth line	DFG	<p>reword so that it reads as follows:</p> <p>“...where feasible, provide water that is of better quality than current exceeds applicable drinking water standards. CALFED ... ”</p>	

10	Chapter 4; Levees	46	first paragraph	DFG	Add the following sentence to the end of the paragraph: "Levees in the Suisun Marsh are also important for protecting managed wetlands and for guarding against adverse effects on Delta water quality from catastrophic levee failures."	P
11	Chapter 4; Water Supply Reliability	46	First paragraph; last two lines	DFG	wording is redundant in last two lines with fourth and fifth lines; modify as follows: ".... beneficial uses, improve access to water supplies, and decrease system vulnerability."	
12	Chapter 4; Water Supply Reliability	46	Second paragraph; last two lines	DFG	The EWA is listed as a new component in the third paragraph so it should not be listed in this paragraph. Modify as follows: "... water project operations including the Environmental Water Account;	
13	Chapter 4; 4.1	47	first para	DFG	Add the following wording as follows: "...decision-makers could react quickly to real-time actions of assessments of fish occurrence and vulnerability instead of relying completely on fixed operations requirements based on "typical" fish behavior patterns; which do not always act according to models and scientific analysis	

14	Chapter 4; 4.1	47	First bullet	DFG	Add the following: “Also provides improvements to levees in the Suisun Marsh to protect managed wetlands and guard against adverse effects on Delta water quality from catastrophic levee failures.”	P
15	Chapter 4; 4.1	48	last para	DFG	The document should be consistent in either describing a 20 to 30 year implementation period or an implementation period of thirty years or more.	
16	Chapter 4; 4.1	49	last para, last sentence	DFG	Suggest rewording to read as follows: “Future decisions can be made will depending on how specific conditions and linkages being are satisfied.”	
17	Chapter 4; 4.2	52	4 th para, 4 th sentence	DFG	Suggest rewording to read as follows: “...from the Bay-Delta system and reduced diversion fish impacts associated with the entrainment of fish water diversions.	

18	Chapter 4; 4.2	53	1 st para, 2 nd sentence	DFG	<p>This paragraph should not be under the Water Transfer subsection. It should be given its own subsection as follows:</p> <p style="text-align: center;">“Environmental Water Account: The Environmental Water”</p> <p>Also we suggest rewording as follows:</p> <p style="text-align: center;">“The EWA will be a very important tool could become (or has the potential to be) a very useful tool ...”</p>	P
19	Chapter 4	53	Third paragraph	DFG	<p>Modify Delta Conveyance section second sentence to read as follows beginning with the:</p> <p style="text-align: center;">To varying degrees, aAll three conveyance systems do not inherently decrease the detrimental effects on the ecosystem and Delta water users of using the Delta for water conveyance, while improving the effectiveness of the Delta as a conveyance hub. For alternatives 1 and 2 only features added to the basic approach create ecosystem benefits and lead to them being potentially satisfactory from an environmental standpoint. While Alternative 3 has some inherent ecosystem benefits, its outcome also depends on added features.</p>	P

20	Chapter 4; 4.2	53	Fourth Paragraph	DFG	Add at end of Delta Levee Improvements the following: "Levee improvements in the Suisun Marsh will help protect managed wetlands and guard against adverse effects on Delta water quality from catastrophic levee failures."	P
21	Chapter 4	54	Second Bullet: Improve habitats	DFG	Add "Wetland" to this list	
22	Chapter 4; 4.2	54	bullet 5, 2 nd sub-bullet	DFG	Suggest rewording as follows: "Reduce entrainment or loss of fish at, or otherwise due to, diversions"	
23	Chapter 4; 4.2	54	bullet 6, sub- bullet 3	DFG	Suggest rewording as follows: "Reduce demand reliance on Delta exports during periods when young fish are susceptible to entrainment and other effects of diversions"	
24	Chapter 4; 4.2	55	1 st para after study bullets	DFG	Suggest the following wording: "...necessary to monitor elements of the ecosystem and based on information from the monitoring, modify actions implemented to restore..."	

25	Chapter 4; 4.2	55	2 nd para after study bullets	DFG	Suggest the following wording: “Public and scientific community participation...”	
26	Chapter 4; 4.2	56	Bullet 3	DFG	Are there “current” BMPs for subsidence? Discussion on page 58 implies that there are not.	
27	Chapter 4; 4.2	56	After last bullet	DFG	Add language as follows as a new fifth bullet:	
28	Chapter 4	61	Studies Section	DFG	Add an evaluation of the Hood Diversion to the list.	
29	Chapter 4	62	First two lines	DFG	Add to the sentence the following language: “... therefore these actions will need to be structured so as to minimize adverse water quality impacts while meeting the objectives of the ERP.”	P
30	Chapter 4; Section 4.3	63	Figure	DFG	Wording is redundant to Goal B; modify as follows: “.... beneficial uses, improve access to water supplies, and decrease system vulnerability.”	

31	4.3	64	6 th bullet	DFG	Suggest the following wording: “Increase operational flexibility by Improving the ability of the system to respond quickly and appropriately to biological and hydrological conditions or other unforeseen circumstances by facilitating operations decisions flexibility.”	
32	Chapter 4	65	Goal C	DFG	wording is redundant to Goal B; modify as follows: “.... beneficial uses, improve access to water supplies, and decrease system vulnerability.” Under Objective C-1 add: “and Multi-species Conservation Strategy” at the end of the sentence.	

33	Chapter 4	68	Water Management Strategy Framework Summary	DFG	<p>In the third column for the EWA tool modify as follows:</p> <p>“Adjust EWA operational guidelines and water, funding, storage, and conveyance assets as experience is gained.”</p> <p>Add “Prescriptive Operating Criteria” to the list of tools. In the second column for this tool add:</p> <p>“Implement operating criteria for initial new increases in exports.”</p> <p>In the third column for this tool add:</p> <p>“Implement operating criteria for additional exports and new storage. Adjust operational guidelines as experience is gained.”</p>	P
34	Chapter 4	71	Section 4.3; Water Management Tools Table	DFG	<p>EWA should be listed in its own column, not under Transfers.</p> <p>Wording for Goal A is redundant to Goal B; modify as follows:</p> <p>“.... beneficial uses, improve access to water supplies, and decrease system vulnerability.”</p>	

35	Chapter 4	72 et seq.	Section 4.3; EWA Section	DFG	While an EWA has considerable potential, no interest has bought off on a plan and considerable difficulty is likely in agreeing on a plan. The EWA section starting on page 78 generally describes the related uncertainties well. Hence this section needs to be edited throughout to reflect this conditional nature. e. g. "An EWA could" produce the various results, rather than "The EWA is or will" produce results.	P
36	Chapter 4	72	Section 4.3; First paragraph	DFG	Modify second sentence of paragraph as follows: " Also, for practical purposes the Environmental Water Account requires the ability to purchase water and transfer for modifying export pumping, instream flows, and Delta flow patterns or the account's flexibility will be greatly diminished cannot function."	
37	Chapter 4	72	Section 4.3; 3 rd para, last sentence	DFG	Suggest the following wording: "These assets are used to modify export pumping rates to reduce pumping at avoid times more critical for to fish species in the Delta and ..."	

38	Chapter 4	74	Section 4.3; last para	DFG	<p>Replace the second, third, and fourth sentences with the following:</p> <p>“Storage that is dedicated to the environment is an essential element of an Environmental Water Account. While initially the account will access existing storage to store its water assets on a temporary basis for later use to benefit the ecosystem, in the long run new storage, a portion of which is dedicated to the environment, would significantly improve effectiveness of the account. New storage would provide an assurance for continued successful operation of the account that temporary rights to existing storage would not.”</p>	P
39	Chapter 4	74	Section 4.3; last para	DFG	<p>It is noteworthy that this paragraph points out the importance of storage if there is to be an EWA. We have emphasized this point ourselves. However, it is erroneous to suggest, as this paragraph does by its emphasis and the absence of corresponding paragraphs describing the water supply benefits of new storage, that the primary justification for the construction of new storage facilities is that it is essential for a successful EWA and environmental improvements.</p>	

40	Chapter 4	75	Section 4.3; last para	DFG	Similar to the discussion of storage, this paragraph implies that the EWA would make the most use of the increased south Delta export capacity. This is not the case. This paragraph mixes points related to the ability to use the increased pumping capacity (e.g. fish screens, operable barriers) with points about increased flexibility enabled by its use (e.g. joint point of diversion).	
41	Chapter 4	76	Section 4.3; same	DFG	The factors that will be used in a decision on a diversion at Hood need to be described in this section.	
42	Chapter 4	76	Section 4.3; First paragraph;	DFG	Modify line 4 as follows: “ ... stage needs and selected extension and screening of agricultural diversions for agricultural water supplies in the south Delta.” In line 7 add “be made” after the word “could”.	

43	Chapter 4; 4.3	76	4 th para	DFG	If the EWA is to be part of an approach to obtaining ESA/CESA assurances, its objectives should not be complicated by adding the objective of achieving water quality improvements. Some export water quality advantages accrue from actions to reduce fish impacts (e.g. pumping less water during the peak in TOC concentration in the Delta in February and March) but these should be described as incidental benefits, not a directed purpose of the EWA.	P
44	4.3	76	same	DFG	Study and potential implementation of the Hood diversion will not improve water quality.	
45	Chapter 4	77	Section 4.3; Long-term Levee Protection Plan	DFG	Add the following after the first two lines: “Levee improvements in the Suisun Marsh will help protect managed wetlands and guard against adverse effects on Delta water quality from catastrophic levee failures.”	P
46	Chapter 4	77	Section 4.4; Real Time Monitoring; first paragraph	DFG	The second sentence grossly exaggerates the magnitude and ease of reducing entrainment impacts. The basic point of the paragraph can be made satisfactorily with the second and fourth sentences deleted, and they should be deleted.	

47	Chapter 4	80-81	Section 4.4; EWA Attributes Section	DFG	This section needs to recognize that an EWA requires certain institutional attributes to achieve the described potential. Change the introductory sentence to read as follows: “...combination of assets and operational procedures could...”	P
48	Chapter 4	80	The Environment al Water Account	DFG	Again, this strongly indicates it is an EWA obligation to “provide water quality improvements for all users”. The EWA is expected to be an adjunct to prescriptive standards which in combination have the objective of protecting fish and aquatic habitat.	P
49	4.3	80	last para.	DFG	What is meant by “...address potential impacts to other beneficial uses”? Which uses? What impacts? This needs to be clarified.	
50	Chapter 4	80	Section 4.4; EWA Attributes Section	DFG	Consider adding a sixth element that recognizes that the EWA could provide substantial water quality benefits incidental to the benefits to aquatic resources.	
51	Chapter 4	81	Item 8	DFG	Modify last sentence as follows:	

52	Chapter 4	81	Seventh paragraph	DFG	Modify last sentence to read: “Finally it had an income of \$30 to \$40 million per year for water purchases and willing sellers were always found.”	
53	4.3	81	item 8, last sentence	DFG	Revise as follows: “With appropriate prescriptive standards and a properly sized EWA,.....”	
54	Chapter 4	81	Initial Evaluation	DFG	Consider deleting the second paragraph in this section. If it's kept see comment 55.	
55	4.3	81	6 th para	DFG	A couple of thoughts could be added to this paragraph. We have acknowledged there are limitations of having used only this particular five year sequence. Although it includes wet and dry years, few if any believe these five years have revealed all the vagaries that EWA management would encounter. In addition, although we have tried to play out each year a few days or weeks at a time in each game, the claim of “no foresight” during gaming is a difficult to make after three or four games with the same hydrology and fish data. We recognize the value of and need to play “blind” games where the future is not known but have not done it yet.	

56	4.3	82	1 st para	DFG	The four scenarios did NOT have the same baseline. In every case, many assumptions were varied, including the capacity and configuration of storage and conveyance facilities and who controlled their use. After one game, water quality was added as a concern and water users were given money to use to achieve WQ improvements through acquisitions when they chose. It would be accurate to say that the four scenarios all assumed the 1995 WQCP and upstream and in-Delta AFRP actions in the base model run.	
57	4.3	82	2 nd para	DFG	We recall nothing about EWA monetary assets earning interest or the EWA paying interest on loans. This concept was not used and reference to it should be deleted..	
58	4.3	83	1 st para	DFG	This paragraph should point out that the SWRCB must approve joint point of diversion and that the CALFED agencies have proposed to the SWRCB that such approval be subject to an operations plan developed by CALFED and accepted by the SWRCB .	
59	4.3	84	last para	DFG	It should be pointed out that selective variation in application of the E:I standard was necessary to get the EWA through without defaulting on debts and these variations had adverse consequences for some fish species in the Delta.	
60	Chapter 4	86	Findings	DFG	Delete the last line of the seventh bullet.	P

61	Chapter 4	87	Section 4.4; Concerns	DFG	<p>Add the following two bullets:</p> <ul style="list-style-type: none"> • In actual operation, determining abundance trends in relation to population size in real time will be very difficult. • EWA operations will be much more complex than present normal project operations. 	
62	Chapter 4	88	General Conclusion	DFG	<p>Reword #1 as follows:</p> <p>“A properly implemented EWA would is-a superior way of achieve-ing both...”</p>	
63	Chapter 4;	89	CALFED Proposal	DFG	<p>Reword first line as follows:</p> <p>“A properly implemented EWA would is-a superior way of achieve-ing both...”</p>	
64	Chapter 4	88	Section 4.3; item 9.	DFG	<p>As noted earlier, it is our view that providing water quality improvements for all users is not a purpose of the EWA. We recommend that the sentence be modified as follows:</p> <p>“... the CALFED Water Quality Program-to provide water quality improvements to all users.”</p>	P

65	Chapter 4	89	Section 4.3; item 9.	DFG	Add: "Assure that water quality benefits observed to occur incidental to operational changes to protect fish are recognized."	
66	Chapter 4	90	Table at bottom of page	DFG	The Environmental Water Account column should be moved out from under the "Transfers" section into its own column similar to waste management recycling.	P
67	Chapter 4	92 & 93	Surface Storage Investigation	DFG	The third paragraph under this section includes off-aqueduct with in-delta and adjacent to Delta storage studies. Since north of the Delta storage studies is separate from in-Delta, it is therefore recommended that the off-aqueduct studies be in a separate paragraph here and on a separate line on page 91.	
68	Chapter 4	99	Option 2	DFG	Delete the last sentence related to landowner opposition.	
69	Chapter 4; Water Quality Section	100	Water Quality Program	DFG	If there continues to be a separate allotment of funds to provide an "environmental water account" to address water quality issues it should be described here.	P

70	Chapter 4; Draft Preferred Program Alternative/4.4 Program Elements	103	Third paragraph	DFG	Industrial sources of selenium discharge into the lower Bay-Estuary are not limited to Suisun Bay. The last sentence of this paragraph should read as follows: “Selenium impacts from industrial sources in the Suisun and San Pablo bays will be reduced by improved source control.”	
71	Chapter 4	109	Section 4.4; Third paragraph	DFG	The response will probably not be perceived as an adequate response to the concern. Should it be modified?	
72	Chapter 4.	110	Third paragraph, last sentence	DFG	The following wording should be changed from “... Managed Refuges .” to “...Managed Wetlands”.	

73	Chapter 4	136	Modified Through Delta Conveyance Section	DFG	<p>This alternative was not “designed to improve flow patterns to benefit fisheries throughout the Delta”. It was specifically designed for the other two stated purposes and to improve export water quality. Fisheries benefits depend on adding features and operational measures to compensate for flow patterns which are detrimental to fish. Since the other two conveyance descriptions are silent on their fishery implications, we suggest deleting the inaccurate phrase and being silent on the subject. Therefore, modify last sentence of this section to read as follows:</p> <p>“Variations include a wide variety of channel configurations, designed to improve flow patterns to benefit fisheries throughout the Delta, provide flood control, ... “</p>	P
74	Chapter 5	145	General Comment for Levees' section	DFG	<p>This section needs to be updated to include the latest Policy Group decision to include the Suisun Marsh in the CALFED Levee Program.</p>	P
75	Chapter 5	146	Levee section	DFG	<p>Add an action at the end of this list:</p> <p>“13. Complete the evaluation of the best method for addressing the Suisun Marsh's levee system and begin implementation.”</p>	P

76	Chapter 5	151	Ecosystem Restoration	DFG	<p>Item 6:</p> <p>Add at the end of the item:</p> <p>“...and coordinate these supplies with the Environmental Water Account.”</p> <p>Add the following items:</p> <p>Acquire and convert land for various aquatic habitat types in each of the Delta's ecological units such as tidal perennial and tidal emergent wetland.</p> <p>Acquire and convert land for various terrestrial habitat types in each of the Delta's ecological units such as seasonal wetlands and riparian.</p> <p>Initiate implementation of recovery efforts for the riparian woodrat and riparian brush rabbit on the San Joaquin and in the Delta.</p>	P
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77	Chapter 5	151	Section 5.1	DFG	The agency-stakeholder group evaluating diversion effects recommended that within the Delta the highest priority habitat restoration for salmon is along the Sacramento River. The Stage 1 actions described here do not include that. That may be justified by cost or institutional feasibility, but it needs to be a conscious policy decision.	P
78	Chapter 5	158-159	Section 5.1	DFG	This very modest proposal for Stage 1 actions is not in synch with the thinking being advanced in EWA development. EWA gaming has identified surface storage as being very important, and has variously assumed some enlargement of Shasta and in- or near-Delta storage as being available by the end of Stage 1. That expectation is described on page 83. The two perspectives need to be reconciled.	P
79	Chapter 5	160	Conveyance	DFG	Insert new section as agreed to in Small Policy Group on May 18.	
80	Chapter 5	161	Conveyance; South Delta Improvements; bullets 6-12	DFG	Bullets 6-12 should be modified to incorporate the latest decisions drafted by the Policy Team on Tuesday May 18, 1999 with regards to South Delta Improvements.	

81	Chapter 5	161	Conveyance; North Delta Improvements; entire section	DFG	We do not understand the components as described. Are items 1-3 and 6-7 the generic steps towards the specific programs in 8-10? Are items 4 and 5 anything more than generic descriptions of item 10? They sound like they could simply be directed towards implementation of part of the ERP. In that case they should be in the ERP and not here. Appropriate clarification is needed. This section should be modified to incorporate the latest decisions drafted by the Policy Team. Also, this section should be modified to incorporate the latest decisions drafted by the Policy Team.	P
82	Chapter 6	187	Section 6.1; first paragraph	DFG	Modify the last sentence as follows: "The MSCS addresses the needs of species and habitats at the landscape level and identifies recommends measures to compensate for CALFED Program impacts and to benefit species and habitats."	
83	Chapter 6	194	Section 6.1; last paragraph	DFG	Modify the last line as follows: "These additional conservation measures contribute to the ERP by identifying suggesting temporal or ..."	
84	Chapter 6	190	Figure	DFG	Problem area needs to include the Suisun Bay.	